

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W. R. GRACE & CO., et al., ¹) Case No. 01-01139 (AMC)
) (Jointly Administered)
Reorganized Debtors.)
) Hearing Date: October 1, 2021, at 11:00 a.m.
) Objection Deadline: September 24, 2021, at 4:00 p.m.
)

**NOTICE OF THE REORGANIZED DEBTOR'S MOTION FOR AN ORDER
FINDING THAT RUNE KRAFT IS IN CONTEMPT OF THIS COURT BY
WILLFULLY AND KNOWINGLY VIOLATING THIS COURT'S CONFIRMATION
ORDER AND ITS ORDERS OF AUGUST 26, 2021 [DOCKET NO. 33256] AND
SEPTEMBER 8, 2021 [DOCKET NO. 33265] AND IMPOSING SANCTIONS**

TO: (i) the Office of the United States Trustee; (ii) Counsel for the WRG Asbestos PI Trust; (iii) Counsel for the Asbestos PI Future Claimants Representative; (iv) Counsel for the Asbestos PD Future Claimants Representative; (v) Counsel for the WRG Asbestos PD Trust (7A); (vi) Counsel for the WRG Asbestos PD Trust (7B); (vii) Counsel for the CDN ZAI PD Claims Fund; (viii) those parties that requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; and (ix) Rune Kraft.

On September 17, 2021, the above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) filed the attached *The Reorganized Debtor’s Motion for an Order Finding That Rune Kraft is in Contempt of This Court By Willfully and Knowingly Violating This Court’s Confirmation Order and Its Orders of August 26, 2021 [Docket No. 33256] and September 8, 2021 [Docket No. 33265] and Imposing Sanctions* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **September**

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

24, 2021. At the same time, you must also serve a copy of the objections or responses, if any, upon the following: (i) co-counsel for the Reorganized Debtor, Kirkland & Ellis LLP (Attn: Adam C. Paul, Esq. and John Donley, Esq.) adam.paul@kirkland.com and john.donley@kirkland.com and The Law Offices of Roger Higgins, LLC (Attn: Roger J. Higgins, Esq.) rhiggins@rogerhigginslaw.com, and Pachulski Stang Ziehl & Jones LLP, (Attn: Laura Davis Jones, Esq. and James E. O'Neill, Esq.) ljones@pszjlaw.com and jo'neill@pszjlaw.com; (ii) the Office of the United States Trustee, (Attn: Richard L. Schepacarter, Esq.) richard.schepacarter@usdoj.gov; (iii) counsel for the WRG Asbestos PI Trust; Campbell & Levine, LLC, (Attn: Marla Rosoff Eskin, Esq., Mark T. Hurford, Esq. and Philip E. Milch, Esq.) meskin@camlev.com, mhurford@camlev.com, pmilch@camlev.com; (iv) counsel for the Asbestos PI Future Claimants Representative, Phillips, Goldman, McLaughlin & Hall, P.A., (Attn: John C. Phillips, Jr., Esq.) jcp@pgmhlaw.com; (v) counsel for the Asbestos PD Future Claimants Representative, Seitz, Van Ogtrop & Green, P.A., (Attn: R. Karl Hill, Esq.) khill@svglaw.com, and Alan B. Rich Law Office (Attn: Alan B. Rich, Esq.) alan@alanrichlaw.com; (vi) counsel for the WRG Asbestos PD Trust (7A), WRG Asbestos PD Trust, (Attn: Richard B. Schiro, Esq.) rbschiro@schirolaw.com and Dykema Cox Smith, (Attn: Deborah D. Williamson, Esq.) dwilliamson@dykema.com; and (vii) counsel for the WRG Asbestos PD Trust (7B), Sullivan Hazeltine Allinson LLC, (Attn: William D. Sullivan, Esq.) bsullivan@sha-llc.com and Barnwell Whaley Patterson & Helms LLC, (Attn: M. Dawes Cooke, Esq.) mdc@barnwell-whaley.com.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE
WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF
REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE OBJECTION WILL BE HELD BEFORE THE HONORABLE ASHELY M. CHAN AT THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA, ROBERT N.C. NIX FEDERAL COURTHOUSE, 900 MARKET STREET, SECOND FLOOR, COURTROOM 4, PHILADELPHIA, PA 19017, ON **OCTOBER 1, 2021, AT 11:00 A.M. PREVAILING EASTERN TIME.**

Dated: September 17, 2021

THE LAW OFFICES OF ROGER HIGGINS, LLC
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and

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/s/ James E. O'Neill
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